

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA)
)
) CAUSE NO. 2:06 CR 63
)
VIKRAM BUDDHI

**GOVERNMENT'S RESPONSE TO THE DEFENDANT'S
PROPOSED VOIR DIRE QUESTIONS**

Comes now the United States of America, by counsel, Joseph S. Van Bokkelen, United States Attorney for the Northern District of Indiana, through Assistant United States Attorney Philip C. Benson, and hereby files its response to the Defendant's Proposed Voir Dire Questions and in support of its response states as follows:

The government lists below its responses to each of the defendant's proposed voir dire questions:

1. Objection relevancy.
2. No objection.
3. No objection.
4. Objection relevancy.
5. Objection relevancy.
6. No objection.
7. Objection relevancy.
8. No objection.
9. Objection relevancy.

10. Objection. This question is overly broad and does not bear any relevance to the issue at hand. The issue before the jury is whether or not the defendant's words constitute a true threat as defined by the case law and the statute.
11. Objection relevancy.
12. Implicit in the defendant's voir dire question is that the vulgarity and offense language of the words should not be considered in determining their legality. The government believes this misstates the law. However, the government has no objection to the question being reworded to read: Will you base your decision upon the law as instructed by the court as put aside any personal prejudices you may have regarding any language you may hear in this trial.
13. The government has no objections.
14. Objection relevancy.
15. No objection.
16. Objection relevancy. This case is not does not involve the use of a firearm or a felon in possession of a firearm, therefore the jurors' association with the Second Amendment of a group involving firearms is irrelevant.
17. Objection relevancy.

Respectfully submitted,

JOSEPH S. VAN BOKKELEN
UNITED STATES ATTORNEY

By: S/ Philip C. Benson
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2007, I filed the foregoing with the Clerk of Court using the EC/CMF system which sent notification of such filing to the following:

John Martin

S/ Sandra M. Clanin
Sandra M. Clanin
Legal Assistant